



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

1595 Wynkoop Street
DENVER, CO 80202-1129
Phone 800-227-8917
<http://www.epa.gov/region08>

FEB - 8 2008

Ref: 8EPR-N

Gary Torres
Bureau of Land Management
Monticello Field Office RMP Comments
365 N. Main
Monticello, Utah 84535

RE: Draft Resource Management Plan and
Environmental Impact Statement for the
Monticello Field Office Planning Area
CEQ#: 20070453

Dear Mr. Torres:

Consistent with our responsibilities and authorities under the National Environmental Policy Act (NEPA), and Section 309 of the Clean Air Act, the Region 8 office of the U.S. Environmental Protection Agency (EPA) has reviewed the Draft Resource Management Plan (RMP) and Environmental Impact Statement (EIS) for the Bureau of Land Management's (BLM) Monticello Field Office Planning Area. The BLM manages approximately 1.8 million acres of public lands and 2.5 million acres of mineral estate within the Monticello Planning Area (MPA). This area includes the southern two-thirds of San Juan County and a small portion of southern Grand County in southeastern Utah.

This RMP will revise and replace the 1991 San Juan Resource Area RMP. When completed, the RMP revision will provide long-term management direction to BLM on planning issues including: recreation and travel, minerals, special designations such as Areas of Critical Environmental Concern (ACECs), non-Wilderness Study Areas (WSAs) lands with wilderness characteristics, visual resources, and cultural resources. The Draft RPM/EIS considers five alternatives. Alternative A, No Action, would continue the existing management program. Alternative B emphasizes management actions to conserve ecosystem health and protect landscapes as well as encourage non-motorized recreation. Alternative C, BLM's Preferred Alternative, emphasizes protection of important natural resources as well as commodity production and a full range of recreation opportunities. Alternative D emphasizes commodity production and motorized recreation. Alternative E is equivalent to Alternative B except that it includes management of non-WSA lands to maintain their wilderness characteristics.

Our review of the Draft RMP/EIS includes general and specific concerns associated with recreation and travel management including off-highway vehicle (OHV) use, special designations including ACECs, protection of visual and cultural resources, management of non-WSA lands with wilderness characteristics, and air quality. These comments are provided in the enclosed "Detailed Comments." EPA's primary concerns are: the lack of information provided in BLM's analysis of air quality impacts from various sources in the MPA including oil and gas development; 2) the environmental impacts resulting from OHV travel and other recreational uses of BLM lands; 3) the environmental impacts resulting from a proposed overall reduction in Visual Resource Management (VRM) Class I and II designated landscape acreage.

Air Quality Analysis Concerns

In the Draft RMP/EIS, BLM analyzed general trends in air quality and visibility impacts specific to new sources in the planning areas without conducting air dispersion modeling. As stated on top of page 4-4 of the Draft RMP/EIS, "Conclusions and projections on air quality impacts are therefore semi-quantitative in nature and are intended to forecast potential trends, rather than identify absolute air-pollutant concentrations." Several references in Section 4.3.1.2 refer to proposed project pollutant emissions projected concentrations "are well below applicable National Ambient Air Quality Standard (NAAQS)." We found projected concentrations specified in table 3-8 of BLM's Draft Analysis of the Management Situation (AMS) for the Monticello BLM Field Office. However, the projected concentrations are not presented in the Draft RMP/EIS. Although the Draft RMP/EIS presents general procedures used to estimate the impacts (Page 4-14), it lacks detail about the methods used to calculate the projected concentrations. We recommend that BLM disclose the methodologies and results in the Final Environmental Impact Statement (FEIS).

The results of the analysis omit potential impacts to visibility and deposition. The planning area encompasses the Class I area of Canyonlands National Park and is near Capital Reef, Arches, and Mesa Verde National Parks, which all enjoy special protection of air-quality related values. Ozone may be of particular concern because of the potential emissions of volatile organic compounds and oxides of nitrogen from sources in the planning area, including oil and gas development. Although page 4-11 of the Draft RMP/EIS mentions carbon dioxide (CO₂) as a greenhouse gas that would be emitted by fires in the planning area, the document does not address potential effects on climate change in general. The FEIS should include information on these effects.

Under the alternatives listed in the Draft RMP/EIS, general air quality impacts were characterized by various methods for oil and gas activities, recreation, including OHV use, and fires and fuels management. The Draft RMP/EIS does not describe nor calculate the projected concentrations for any of the Alternatives. We recommend that BLM disclose projected NAAQS and visibility pollutant concentrations in the FEIS.

Section 4.7.4.1.1 summarizes cumulative impacts to air quality. Mining and oil and gas developments are expected to occur at a relatively low rate (e.g., 5-21 gas wells/year). Because of the pollutant estimate approach taken, however, it is not possible to determine potential

impacts from specific development on sensitive receptors in or near the planning area. We recommend the FEIS contain wording similar to the following excerpt from the Rawlins, Wyoming Draft RMP/EIS, which used a comparative, emissions-based approach: *As project-specific developments are proposed, quantitative air quality analysis would be conducted for project-specific assessments performed pursuant to NEPA.*

Visual Resource Management Concerns

The BLM manages a considerable amount of landscape of outstanding scenic quality (e.g., Lockhart Basin) which is serving an increasingly important role in local communities' growing service-based economies within the MPA. We are concerned with BLM's proposal to significantly reduce the overall amount of landscape acreage under VRM Class I/II designation in Alternative C. This would allow for significantly more moderate to major surface disturbances, some of which would visually dominate the MPA's internationally-recognized natural landscape. We also believe this would result in a higher occurrence of environmental impacts to a number of other important resources including vulnerable (e.g., reclamation-limited) soils, vegetation, cultural sites, and riparian areas. We recommend that BLM retain most or all of its VRM Class I/II landscape within the MPA consistent with its Visual Resource Inventory (VRI).

Travel/Recreation Management Concerns

The BLM's MPA is also internationally renowned for its recreational opportunities. Approximately two million visitors per year come to recreate within the MPA. As a result, some of the MPA's ecological and other important resources have been significantly impacted. In response, BLM is taking, or is proposing to take, a number of actions including restricting open OHV use in all but two areas within the MPA by limiting recreational travel to designated routes. However, we are concerned that BLM will be unable to adequately control and mitigate ongoing and future impacts to cultural, riparian, visual and soil resources, vegetation, rare plant and animal species, and other unique and valuable resources within the MPA. Our detailed comments recommend a number of actions (e.g., leveraging of law enforcement resources) EPA believes would be needed to successfully address these impacts.

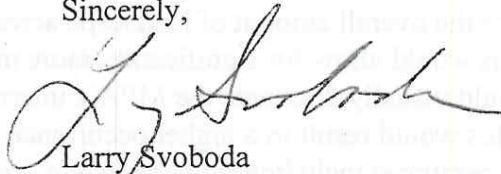
EPA's Rating

EPA has a responsibility to provide an independent review and evaluation of the potential environmental impacts associated with this Draft RMP/EIS. Based on the procedures EPA uses to evaluate the adequacy of the information and potential impacts of the Preferred Alternative, EPA is rating the Draft EIS as Environmental Concerns-Insufficient Information, "EC-2." "EC" signifies that EPA's review of this Draft RMP/EIS has identified environmental impacts that should be avoided in order to fully protect the environment. EPA is concerned that the actual and potential environmental impacts associated with visual and travel/recreation management issues BLM is facing will not be adequately mitigated under the Preferred Alternative, and that a number of actions need to be included in the FEIS. The rating of "2" indicates that the Draft RMP/EIS lacks sufficient information to fully assess environmental impacts that should be avoided in order to fully protect the environment. EPA is concerned about the lack of

information associated with BLM's analysis of air quality impacts within the MPA and believes that this information should be included in the Final RMP/EIS. A full description of EPA's EIS rating system is enclosed.

EPA recognizes the complexity and diversity of the proposed resource management actions and supports BLM's intention to move forward promptly to implement a new RMP plan based on emerging issues and changing circumstances. We expect that planning issues discussed in our comments will continue to be among those monitored as the plan is implemented. If you would like to discuss these comments, or any other issues related to our review of the Draft RMP/EIS, please contact Douglas Minter at 303-312-6079. Thank you for the opportunity to comment.

Sincerely,



Larry Svoboda
Director, NEPA Program
Office of Ecosystems Protection and Remediation

Enclosures



Detailed EPA Comments on the Bureau of Land Management Monticello's Draft Resource Management Plan and Environmental Impact Statement

Background

The MPA is situated in the canyon, plateau, and desert areas of the Colorado Plateau Physiographic Province. The MPA encompasses Glen Canyon National Recreation Area, the Abajo Mountains of the Manti-La Sal National Forest, Canyonlands National Park, Natural Bridges and Hovenweep National Monuments, and the White Mesa Ute and Navajo Indian Reservations. The Monticello FO shares boundaries with lands administered by the BLM Moab and Dolores Field Offices. Beyond its internationally-recognized visual resources and recreational opportunities, many important natural and cultural resources are found in the MPA. These include a number of federally listed wildlife species (e.g., the Mexican spotted owl), and over 28,000 cultural sites identified to date including many Pre-Columbian, Archaic and Paleo Indian, Native American, and historic properties and trails.

Project Overview

When completed, the RMP revision will provide a set of comprehensive, long-range decisions for: 1) managing resources throughout the planning area; and 2) identifying allowable uses on the public land surface and federal mineral estate administered by BLM. Five Alternatives are proposed:

1. Alternative A is the No Action Alternative that would continue the existing management program under the 1991 San Juan Resource Area RMP.
2. Alternative B emphasizes management actions to conserve ecosystem health and protect landscapes as well as encourage non-motorized recreation.
3. Alternative C is the Preferred Alternative emphasizing protection of important natural resources as well as commodity production and a full range of recreation opportunities.
4. Alternative D emphasizes commodity production and motorized recreation (note: as this Alternative would generally result in relatively greater environmental impacts than Alternatives B, C, or E, it is not discussed further in the comments below).
5. Alternative E would be based on Alternative B except 582,360 acres of non-WSA lands would be managed to maintain their wilderness characteristics.

Under Alternative C, 2,311 acres would be designated for open (i.e., cross-country motorized) OHV travel use (versus 0 acres in Alternatives B and E), a **significant decrease** from the 611,310 acres currently "open" under Alternative A. Similarly, Alternative C would close 418,667 acres (versus 423,698 acres in Alternative B and 970,436 acres in Alternative E) to OHV travel, a **significant increase** from the 276,430 acres currently closed under Alternative A. All other OHV use is proposed to be limited to 2,820 miles of designated travel routes under

Alternative C (versus 2,396 miles in Alternative B and 2,217 miles in Alternative E), a **decrease** from the 3,069 miles of undesignated, existing routes under Alternative A.

Alternative C also proposes to: 1) designate five Special Recreation Management Areas (SRMA) covering 508,512 acres (equivalent to Alternatives B and E), an **increase in number and decrease in acreage** from the existing three SRMAs covering 701,761 acres under Alternative A; 2) designate six Areas of Critical Environmental Concern (ACEC) covering 76,764 acres (versus 12 ACECs covering 521,141 acres in Alternatives B and E), a **decrease** from the 10 ACECs covering 488,616 acres currently designated under Alternative A (note: approximately 58% of existing ACEC acreage is located in WSAs); 3) recommend 18.4 miles of 12 eligible rivers as suitable for Wild, Scenic or Recreational River (WSR) designation (versus 92.4 miles in Alternatives B and E), an **increase** as no river miles are currently recommended as suitable under Alternative A; and 4) manage **no acres** of non-WSA lands to maintain their wilderness characteristics (versus 582,360 acres of non-WSA lands in 29 areas under Alternative E located in the central and western part of the MPA), equivalent to the absence of existing management of these lands under Alternative A.

Under Alternative C, 577,180 acres would be designated as VRM Class I or II to preserve and retain the existing scenic character of the landscape (versus 748,309 acres in Alternative B and 1,109,848 acres in Alternative E), a **significant decrease** from the 726,687 acres currently designated VRM Class I or II under Alternative A. The remaining 1,225,915 acres would be designated as Class III or IV under Alternative C (versus 1,034,813 acres in Alternative B and 671,828 acres in Alternative E), an **increase** from the 1,054,681 acres currently designated VRM Class III or IV under Alternative A.

For oil and gas leasing, Alternative C proposes to: 1) close about 395,329 acres (versus 416,612 acres in Alternative B and 971,463 acres in Alternative E), a **slight increase** from the 385,316 acres currently closed under Alternative A; 2) manage 39,323 acres with no surface occupancy (NSO) stipulations (versus 125,105 acres in Alternative B and 53,915 acres in Alternative E), a **decrease** from the 161,224 acres currently stipulated as NSO under Alternative A; 3) open 629,472 acres with standard stipulations (versus 365,170 acres in Alternative B and 213,288 acres in Alternative E), an **increase** from the 578,604 acres currently with standard stipulations under Alternative A; and 4) manage the remaining 719,501 acres with timing limitation (TL) or controlled surface use (CSU) stipulations (versus 876,740 acres in Alternative B and 545,641 acres in Alternative E), an **increase** from the 659,626 acres currently with TL or CSU stipulations under Alternative A. Under Alternative C, approximately 196 oil and gas wells are projected for all (BLM and non-BLM) lands within the MPA over the next 15 years, the majority of which (120) would be in the Blanding Sub-basin in the eastern part of the MPA.

Travel and Recreation Management

We commend BLM for moving from allowing open OHV travel throughout many parts of the MPA to limiting recreational travel to designated routes. We believe such designation in open OHV travel and unrestricted camping areas where resource damage is occurring is particularly important. These areas include: 1) Indian Creek, Dry Valley Summit, Montezuma

Recapture Drainages, Butler-Comb-Lime, Cedar Mesa, Southwest Canyons, and Dark Canyon-Beef Basin. Specifically, these areas are experiencing, or could experience, a number of environmental impacts including noise and air pollution from exhaust emissions, water quality impacts from erodible soils and stream sedimentation, loss of listed and sensitive wildlife and riparian habitat, and loss of cultural resources due to looting, vandalism, etc. We also commend BLM for closing OHV travel (i.e., Recapture Canyon) or restricting OHV travel to existing roads and trails (e.g., Indian Creek) where riparian, soil, vegetation, visual, and cultural resources have already been significantly impacted.

Alternative C's proposal to restrict open OHV travel within the MPA to only two areas, 2,214 acres near Indian Creek and 97 acres in Butler Wash, has the potential to improve existing conditions of known sensitive resources as well as the vast majority of user experiences throughout the entire MPA. However, we are concerned that camping and unrestricted vehicle travel that would continue to occur in these two areas will result in additional damage to soils, scenic values, water quality, vegetation, cultural resources, and/or riparian resources. This includes the 20 acres of non-WSA lands with wilderness characteristics in the Indian Creek area where soil resources and vegetation are at particular risk, and 135 acres of riparian areas (see Wild and Scenic River (WSR) designation recommendations below). Therefore, we can support this limited designation of continued open OHV travel in the Final RMP/EIS if BLM: 1) limits this recreational use to non-riparian areas and areas outside non-WSA lands with wilderness characteristics; and 2) is able to restore and protect these areas' resources noted above. Absent successful restoration and protection, we recommend that OHV travel in all or parts of these two areas be subsequently limited to designated routes only with the proper mitigation measures (i.e., fencing and other barriers, signage, etc.) in place.

As another means by which to address the environmental impacts from OHV travel and associated activities (e.g., unrestricted camping), we suggest BLM develop and implement successful partnerships with other federal, state, and county partners. Specifically, we recommend that the Monticello Field Office consider working with San Juan County using the successful partnership model developed between the Moab Field Office and Grand County for managing the Sand Flats Recreation Area. We believe such partnerships are key to building the financial capacity necessary to maintain and restore areas (e.g., Indian Creek) that have been significantly impacted from heavy and intense recreational use within the MPA.

We recognize BLM's law enforcement staff is faced with the considerable task of monitoring compliance and addressing violations associated with the growing demands for BLM lands within the MPA, including recreation. Given its limited capacity in the near-term to substantially increase its law enforcement presence to address this demand, EPA recommends that BLM leverage its existing law enforcement resources to the maximum extent possible. Specifically, we recommend that, in collaboration with its local partners, BLM maintain a credible field presence for promoting and monitoring recreational user compliance by hiring seasonal (spring through fall) field technicians to: 1) inform OHV and other recreational users of the management prescriptions in place; 2) construct signage and fencing or other barriers to prevent further impacts; 3) promptly remediate any new impacts to further discourage land use violations; and 4) document and report violations to BLM enforcement officers for ticketing.

Visual Resource Management

The MPA “contains an unusually large number of areas that possess a high degree of scenic quality and a high level of visual sensitivity including Dark Canyon Wilderness, Comb Ridge, Comb Wash, Butler Wash, Lockhart Basin, the Grand Gulch/Cedar Mesa Plateau and associated canyons, Valley of the Gods, Indian Creek Corridor, Goosenecks State Park Overlook, and a segment of the San Juan River from Sand Island to Clay Hills” (page 3-160). The BLM also discloses that impacts to the landscape within the MPA are growing due to rapid increases in recreational (e.g., OHV) use. Tourism associated with national parks and monuments located within or adjacent to the MPA is contributing to the cumulative impact to the MPA’s unique visual resources (page 3-163).

While BLM is proposing an increase of 53,604 acres of VRM Class I designated landscape, we are concerned that BLM is proposing an overall 23% reduction in landscape acreage currently classified as VRM Class I/II within the MPA from 726,687 acres to 577,180 acres under Alternative C. We are particularly concerned that Lockhart Basin, a visually sensitive area, was inventoried as VRM Class II but would mostly be designated as VRM Class III under Alternative C. This proposal would result in a number of potentially significant environmental and user impacts including: 1) a 48% reduction of VRM Class I/II designated landscapes within non-WSA lands with wilderness characteristics from 240,480 acres to 125,330 acres. As a result, the natural character of these areas could be lost thereby significantly reducing the opportunities for solitude, primitive and other types of recreational uses in many areas of the MPA; and 2) a 30% reduction of VRM Class I/II designated landscapes adjacent to riparian areas from 12,200 acres to 8,600 acres thereby increasing the risk of surface disturbance and associated indirect impacts (e.g., loss of water erodible soils) from human construction.

Consequently, we ask that BLM re-consider protection of its existing VRM Class I/II visual resources within the MPA as currently classified in its VRI (i.e., Alternative A). We also ask that BLM consider designating Lockhart Basin as VRM Class I as proposed under Alternative B (see ACEC recommendation below), thereby avoiding any long-term adverse impacts (e.g., to soil and vegetation resources) from surface disturbances that would otherwise result from limited natural gas exploration projected within the Basin.

Areas of Critical Environmental Concern (ACECs)

We recognize that part of BLM’s rationale for reducing ACEC acreage under Alternative C is based on: 1) a number of WSAs overlapping existing ACECs within the MPA; and 2) the establishment of a Cultural SRMA within the existing Cedar Mesa ACEC to protect a wide array of important cultural resources. However, due in part to the threat of ongoing or potential environmental impacts from a number of surface disturbing activities (e.g., heavy OHV use and limited oil and gas development), we believe that the new Lockhart Basin ACEC (56,293 acres) proposed in Alternative B warrants special designation. Specifically, the visual resources of the Lockhart Basin “are some of the most impressive of the entire Colorado Plateau, and are of local, national, and international significance” (page 3-132). The Basin’s extensive viewshed allows visitors to look deep into Canyonlands National Park, see unique characteristics of landforms

within this relatively pristine area, and view the Basin from many different vantage points. Also, designation of a new Lockhart Basin ACEC would help protect habitat for a number of federally-listed species from adverse impacts including the Mexican Spotted Owl (48,018 acres), the Bald Eagle (1,987 acres), the Southwestern willow flycatcher (1,589 acres), and several fish species (273 acres). Finally, the cultural inventory areas have identified multi-cultural occupations within the Basin, which is unique to the canyonlands area of Utah.

While we support increasing the size of the existing Hovenweep ACEC as proposed under Alternatives B and C, we are concerned that these Alternatives' proposal would change the existing oil and gas leasing stipulation from NSO and TL/CSU to being open to standard stipulations. We believe the potential surface disturbances will have a detrimental effect on the visual, cultural and wildlife resources within this ACEC, and would likely negate the intended protection provided under this special designation. We are particularly concerned that oil and gas development, though projected to be quite limited in acreage, could occur: 1) adjacent to the ACEC's Cajon Pond which provides important riparian habitat for migrating waterfowl and other wildlife; 2) adjacent to the ACEC's 880 acre visual protection zone for unobstructed viewing of cultural sites; and 3) adjacent to Hovenweep National Monument and near Canyons of the Ancients National Monument. Consequently, we recommend that the existing NSO and TL/CSU stipulations be retained as part of this expanded ACEC.

Non-Wilderness Study Areas with Wilderness Characteristics

While we commend BLM for proposing an overall increase the number of acres that would be closed to OHV use under Alternative C, this Alternative also proposes a significant (i.e., 45%) reduction in the number of acres within non-WSA lands with wilderness characteristics that would be closed to OHV use from 53,370 acres to 29,400 acres. While any new OHV route designations would require that users stay on trails, we could not find any specific discussion on the potential environmental impacts associated with this proposed decision. We recommend that BLM specifically disclose these potential impacts (e.g., deterioration of water quality from stream crossings) in its FEIS.

In order to help ensure that important cultural and scenic values, fish, and wildlife resources are adequately protected from environmental impacts associated with heavy recreational (e.g., OHV) uses and other surface disturbing activities, we believe certain non-WSA lands need to be managed for wilderness characteristics. These include the following non-WSA lands within existing or proposed ACECs that are also proposed to have OHV travel routes designated under Alternative C: 1) the 3,905 acres within the Indian Creek ACEC proposed under Alternative C; 2) 515 acres of the Harts Point and 922 acres of the Shay Mountain non-WSA lands that are part of the existing 3,561 acre Shay Mountain ACEC but which would not retain ACEC designation under Alternative C; 3) all or portions of the following six non-WSA lands that are part (i.e., 21%) of the existing 295,336 acre Cedar Mesa ACEC that would not retain ACEC designation under Alternative C: Lime Creek (5,560 acres), Road Canyon (10,830 acres), Valley of the Gods (12,450 acres), Fish and Owl Creeks (21,870 acres), Grand Gulch (11,680 acres), and Comb Ridge (250 acres). This would also provide a level of protection comparable to ACEC designation for vegetation, riparian and soil resources, and the habitat of a

number of federally-listed species including the Mexican Spotted Owl (15,084 acres), the Southwestern willow flycatcher (3,588 acres), and the Bald Eagle (7,407 acres).

Wild and Scenic Rivers and Riparian Areas

Consistent with EPA's regulatory responsibilities under the Clean Water Act, we consider the protection and restoration of the MPA's estimated 20,435 acres of riparian areas/wetlands to be a high priority. Representing 1.2% of the MPA, these resources are particularly valuable within a very arid region of the western U.S. These wetlands can contain diverse functions (e.g., flood storage and ground water recharge) and unique resources, such as rare hanging garden ecosystems, rare plant or wildlife species. Table 3.23 in the Draft RMP/EIS indicates that only 59% of these riparian areas in the MPA are in proper functioning condition (PFC), while the remainder are functioning at risk. We agree with BLM's conclusion that recreational user demands are contributing to decreases in sustainability and PFC (page 3-95), in part due to erosion and degradation of unconsolidated alluvial soils that results from heavy recreational use within riparian canyons.

We are particularly concerned that heavy and intense recreational (e.g., OHV) use in the Indian Creek and Arch Canyon areas are resulting in adverse impacts to the riparian areas along these rivers. We agree with BLM that without managing the 4.8 mile segment of Indian Creek and the 6.9 mile river segment within Arch Canyon as recommended suitable for WSR status, these rivers' recreational outstandingly remarkable values are at risk for being degraded as stated under Alternative C. Consequently, we recommend that both these river segments be designated for WSR status to help restore and protect their recreational values as proposed under Alternative B. This designation would also extend the 100-meter buffer for riparian areas to ¼ mile on either side of these rivers to help ensure that wetlands functioning at risk along Indian Creek can be restored.

Air Quality

Table 3-2 of the Draft RMP/EIS Ambient Air Quality Data for Monticello contains summary data from 2002. The most recent data (2006) should be used in order to ascertain current air quality conditions. Data can be found at these locations:

<http://www.epa.gov/air/data/index.html>

<http://www2.nature.nps.gov/air/monitoring/ads/adsreport.cfm>

Figure 3.3 of the Draft RMP/EIS presents Visibility trend data at the Canyonlands National Park through 1997. Data through 2005 are now available and should be incorporated into the FEIS. Data can be found at this location:

<http://vista.cira.colostate.edu/views/>

Table 3.4 of the Draft RMP/EIS presents an emission inventory for the Monticello area for 2002. More current data should be incorporated as well as including drill rig emissions, mobile sources, construction sources, etc.

Page 4-10 of the Draft RMP/EIS refers to projected concentrations not being compared to PSD Class I and Class II increments because this was assumed to be the responsibility of other agencies and would be addressed during the state permitting process. Where applicable, BLM should disclose impacts to the environment including providing PSD increment analysis.

Section 4.3.1.1 of the Draft RMP/EIS should also include reference to Utah Division of Air Quality (DAQ) regulation UAC R307-401, Permit: New and Modified Sources.

While Section 4.3.1.2.1.1 includes sources of emissions from various Oil and Gas activities, it is unclear how drill rig emission sources were included or treated in the emission inventory. The FEIS should reference the more current emission estimates from the UT DAQ's most recent Annual Report (2005). Also, it is not clear to us how these existing emission sources are interpreted in the Draft RMP/EIS to ensure the Air Quality and Visibility standards are met. We recommend that BLM disclose this information in the FEIS.

The AMS Table 3-4 and Figure 3-3 should be updated with more current data.

AMS Section 3.3.1 should be corrected so that while the Uintah and Ouray Indian Reservation is under the authority of EPA Region 8, The Navajo Indian Reservation is under the authority of EPA Region 9.

Under the heading of Fugitive Dust (Construction Period) on page 4-23, the Draft RMP/EIS states, "Soils in the MPA have been characterized as having low to moderate wind-erodibility." The AMS, however, mentions wind events that have entrained dust from Mancos shale landscapes and caused highway closures and accidents. The AMS also states that "BLM is interested in identifying areas of Mancos derived soils that may be more prone to dust creation after disturbance." The combined information from the two documents suggests that erosion-prone soils are not prevalent, but can contribute to wind-blown dust events where they exist. In the FEIS, BLM should address the potential for these wind events and the Bureau's plans to mitigate their impact, including under drought conditions. Also, the Draft RMP/EIS discusses potential increases in the use of off-highway vehicles (OHV) in the planning area. However, it does not present details of BLM's estimates of this increase (e.g., in vehicle-miles traveled or similar measure) that factored into the estimate of impacts. Please add more specific information on the role of increased OHV use in potential air quality impacts.

Water Quality

Given the relative abundance (206,451 acres) of highly water erodible soils and number of contaminant sources identified within the MPA, we are concerned about current and potential environmental impacts to surface and ground water resources, and indirect impacts to aquatic plant and fish (i.e., federally-listed) species. These sources and resultant impacts include intrusion of saline groundwater, erosion of saline soils, invasive plants (e.g., tamarisk) introducing salts into riparian streams, acid and radionuclide drainage from abandoned mines, sedimentation from grazing, and a variety of impacts (e.g., human waste) from OHV travel and dispersed camping in/around streambeds. Where water quality impacts are significant or water

bodies are particularly vulnerable (e.g., Recapture Reservoir as a 303(d) impaired water due to low dissolved oxygen), more site-specific information is needed in the FEIS on how water quality is being threatened and impacted from one or more of these contaminant sources. We are also concerned that the mitigation measures proposed under Alternative C will not be sufficient to restore surface and ground water resources in these impacted and vulnerable areas. We believe more stringent mitigation measures (e.g., prohibition of dispersed camping in/around impacted or vulnerable water bodies) are needed in order to restore and adequately protect the MPA's water resources.